

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN) ECF Case
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This document relates to:

Burnett, et al. v. Islamic Rep. of Iran, et al., 15-cv-9903 (GBD)(SN)
Arias, et al. v. Islamic Rep. of Iran, 19-cv-41 (GBD)(SN)

**NOTICE OF RULE 60(a) MOTION FOR
CORRECTION TO PARTIAL FINAL JUDGMENT**

Plaintiff by undersigned counsel moves under Federal Rule of Civil Procedure 60(a) for an order correcting this Court's September 6, 2019 Order of Partial Final Default Judgment on behalf of Elizabeth Parks (*see* ECF No. 5087) for reasons stated as follows:

1. It has come to the attention of Plaintiff's counsel that judgment was sought and entered for solatium damages for Elizabeth Parks in the *Burnett* case based on a mistake arising from oversight that Ms. Parks' claims arise in the *Arias* case also represented by the same counsel and also consolidated within this Multi-District Litigation.

2. Through the instant Motion, Plaintiff seeks to correct the mistake by seeking a modification of the Court's prior judgment to permit judgment for Ms. Parks' claim to be entered in the *Arias* case *nunc pro tunc* to the date that the judgment for solatium damages was entered for Ms. Parks previously as of September 6, 2019. The modification requested herein does not affect the substantive claims or relief sought—the default judgment has been entered, and Iran has been notified of the judgment. No new claims are asserted, and no additional plaintiffs have been added. Moreover, because the change is insubstantial (and a judgment on behalf of Elizabeth Parks was

already entered and served on Iran putting it on notice of a judgment), no additional service on Iran is required.

WHEREFORE, Plaintiff respectfully requests the issuance of the Corrected Order of Partial Final Default Judgment on behalf of Elizabeth Parks that is being filed contemporaneously with this motion.

Dated: September 24, 2021

Respectfully submitted,

MOTLEY RICE LLC

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